

## UNITED STATES DISTRICT COURT

**FILED**

for the

March 31, 2023

Western District of TexasCLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America

BY: CD

v.

DEPUTY

DEREK WAI HUNG TAM SING

Case No. SA-23-MJ-00475

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 15, 2023 and March 3, 2023 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1952(a)(3)(A)

Interstate travel or use of means of interstate commerce in aid of  
racketeering enterpriseMaximum Penalties: 5 years imprisonment, \$250,000 fine, 3 years  
supervised release, \$100 mandatory special assessment

This criminal complaint is based on these facts:

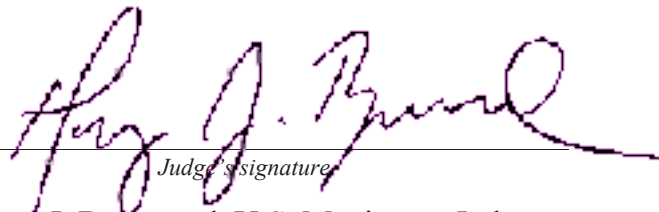
See attached affidavit.

☒ Continued on the attached sheet.

WILLIAM M CARL

Digitally signed by WILLIAM M CARL  
Date: 2023.03.31 11:39:26 -05'00'*Complainant's signature*

William Carl, HSI Special Agent

*Printed name and title*☐ Sworn to before me and signed in my presence.☒ Sworn to telephonically and signed electronically.Date: 3/31/2023City and state: San Antonio, Texas*Judge's signature*

Henry J. Bemporad, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, William M. Carl, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent (SA) employed with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI) in San Antonio, Texas. I have been a Special Agent for approximately twelve (12) years and has been a Federal Agent for a total of (16) years. I graduated Magma Cum Laude from the American InterContinental University with a bachelor's degree in Forensic Science. I received training at the Federal Law Enforcement Training Center, where I successfully completed the Federal Law Enforcement Criminal Investigator Training Program and the Customs Enforcement Agent Training School. My experiences as a Special Agent include, but are not limited to, conducting complex multi-agency investigations, conducting complex investigations simultaneously in multiple legal jurisdictions to include crimes linked to countries outside of the United States, executing arrest warrants, executing search warrants, collecting evidence, and interviewing witnesses. I am currently assigned to DHS/HSI, San Antonio, Texas, Human Exploitation Group (HEG), where I conduct Human Exploitation investigations, and I am tasked with enforcing federal criminal laws, including Title 18, United States Code, Sections 1952 and 2421.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that **Derek Wai Hung Tam SING** has violated Title 18, United States

Code, Section 1952(a)(3)(A) (Interstate and foreign travel or transportation or use of a facility in interstate commerce in aid of racketeering enterprise).

### **STATEMENT OF PROBABLE CAUSE**

#### **A. Initial Investigation Summary**

4. On or about July 5, 2017, the Texas Office of the Attorney General (OAG) and Texas DPS opened an investigation on the Green Tea Spa (Green Tea) located at 2371 Austin Highway, San Antonio, Texas 78218. Green Tea was believed to be a front for prostitution and/or labor trafficking. Online posts indicated that the employees at Green Tea offered sexual services in exchange for money. These posts indicated that the business did not advertise massages because it is not a licensed massage therapy facility. A search of the Texas Department of State Health Services records did not return an active massage license associated with Green Tea.

#### **B. Witnesses Identify Sing as the Owner of Green Tea/Executive X/Meridian**

5. During the course of the investigation, Texas OAG Sgt. Cadwell learned that Green Tea eventually changed its name to Executive X, and that it is now operating as Meridian. Sgt. Cadwell spoke with three witnesses who were familiar with the operations at Green Tea/Executive X/Meridian. Based on the information received from each of these witnesses, including recorded calls with **SING**, Sgt. Cadwell determined **SING** was the owner of Green Tea/Executive X/Meridian and that **SING** also had brothels in San Jose, CA and Sacramento, CA. Sgt. Cadwell also determined the phone number for Green Tea/Executive X/Meridian was 210-605-7329 (the Meridian Phone). A review of bank records, rental car records, and airline records procured via Grand Jury Subpoena confirmed that **SING** regularly travels to San Antonio from California for the purpose of facilitating his illegal prostitution enterprise.

### C. California DOJ Informs Sgt. Cadwell of SING's Current California Operations

6. On or about February 8, 2023, Sgt. Cadwell spoke with California Department of Justice (CAL DOJ) Special Agent (SA) Jimmy Robnett, who stated that CAL DOJ was investigating a business owned and operated by **SING** in Fresno, CA called Club Tan. SA Robnett stated that his office received a tip from a local citizen that Club Tan was actually a brothel. In the tip, the citizen stated that, when he texted the brothel's phone number (559-777-3144) (the Club Tan Phone), he received a response advertising sex acts for pay.

7. On February 5, 2023, while conducting surveillance at Club Tan, CAL DOJ agents saw **SING** pull up to the location with an unidentified female driving a silver Ford Fusion registered to **SING**. Agents positively identified **SING** from his California driver's license photo. With **SING** in view, Agents called the Club Tan Phone. While the phone was ringing, agents saw **SING** manipulating the phone. A few minutes later the Club Tan Phone sent the following text message to agents:

CLUB TAN  
3032 Tulare St  
Fresno, CA 93721  
💎\$40 entrance 30 min sensual relaxation session  
💎💎💎Tips for the ladies are not required but greatly appreciated one twenty.💎💎💎  
💎💎Open daily 9am to 10pm. We are an LMP. Cash only. In calls only, walk-in preferred.💎💎  
💎💎Enter thru the front, Ring Bell💎💎  
💎💎Text us if you have any complaints. Please do not exchange contact information with the workers. If the worker gives you her contact info please let us know.💎💎  
💎💎You can also text us on WhatsApp💎💎



8. **SING** left Club Tan and drove north towards Sacramento. Agents followed, monitoring the Club Tan Phone pings as they went, pursuant to a previously secured warrant for the prospective cell site location of the Club Tan Phone. The Club Tan Phone pinged to **SING**'s location on the highway heading towards Sacramento. Pursuant to a pent/trap warrant, SA Robnett

found that the Club Tan Phone contacted the phone number 916-912-7120. SA Robnett called 916-912-7120, and he received the following text message in response :

Address: 3039 El Camino Ave Sacramento CA 95821

🐱 Rates: 140-20min 160-30min 200-hr 260-hr msog 🐱

❤️ Latinas Rubi and Nadia White Charly ❤️

💕 We open daily 8am to 10pm we do relaxation sessions. Cash only, in calls only, walk-in sessions. 💕

😏 Park behind building, go to back door where lights are Ring Bell. 😏

🗣️ Text us if you have any complaints 🗣️

😏 Please do not exchange contact information with workers. Please let us know if a worker gives you her contact information. 😏

You can also text us on WhatsApp

9. A search of the address from the texted response revealed that it was a brothel previously investigated by the CAL DOJ Sacramento office called Lee Massage. Sgt. Cadwell had also received information from one of the above-referenced witnesses that was tasked with managing **SING's** brothels while he was on house arrest after violating the terms of his supervised release from his prior federal felony conviction<sup>1</sup> indicating 3039 El Camino was the address for a brothel owned by **SING** in Sacramento. CAL DOJ found that the owner of the Sacramento brothel had been previously identified as **SING**.

10. The ping records for the Club Tan Phone showed that the Club Tan Phone was located in the area of 3130 Charing Cross Rd., Glendale, CA during evening and early morning hours. **SING's** address was confirmed by SA Robnett to be 3130 Charing Cross Rd., Glendale, CA. This address is also listed as **SING's** address in bank records subpoenaed from Bank of America. Additionally, on March 1, 2023 and March 2, 2023, CAL DOJ agents conducted

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<sup>1</sup> **SING** was convicted of unauthorized transmission of trade secrets and sentenced to twelve months and one day in prison and three years of supervised release in Central District of California cause number 2:14-cr-00212-CAS.

surveillance at 3130 Charring Cross. On both days, agents saw **SING** at the home. Also on March 2, 2023, agents conducted a traffic stop of **SING** and confirmed his identity.

**D. WhatsApp Messages between SING and One of His Fresno Prostitutes.**

11. SA Robnett provided Sgt. Cadwell with a Fresno Police Department report from September 13, 2022, stating that a security camera installation contractor had reported seeing several women wearing lingerie at Club Tan, and one of the females appeared to be a minor female. The FPD report added that FPD later searched the brothel for juveniles without success but did identify three adult females that were working at Club Tan. Two of those females stated they traveled from Houston to work at Club Tan and the other female state she traveled from Miami for the same purpose. Officers noted no tanning equipment was present in the building and that it appeared the three women were living at Club Tan. After interviewing the female workers and concluding they were actively engaged in prostitution at Club Tan, the FPD officers seized the workers' phones as evidence and later provided the phones to SA Robnett.

12. SA Robnett obtained a search warrant for the three phones, and CAL DOJ later performed a forensic search of the phones. During the search of the phone belonging to worker, Lisset GALIANO, CAL DOJ investigators identified a WhatsApp conversation between GALIANO and individual listed in the phone's contacts as "JUSTIN." The messages between GALIANO and "JUSTIN" spanned over several days and included very specific instructions from "JUSTIN" to GALIANO about when GALIANO was available to work at Club Tan, when she would travel to Fresno to work at Club Tan, when to go to Club Tan once GALIANO arrived in Fresno, codes for the various door locks at Club Tan, and how to engage with customers once she arrived. The conversation included instructions regarding how much GALIANO was supposed to charge customers and how much money she was going to be allowed to keep.

13. During the conversation, GALIANO repeatedly asked “JUSTIN” to let her work in Sacramento after leaving Club Tan. GALIANO stated that she had already worked at Club Tan and at “JUSTIN’S” brothel in San Antonio, but the Sacramento brothel made the most money. GALIANO also sent multiple photos of herself in lingerie to “JUSTIN” which were very similar to the photos associated with Club Tan and Meridian ads, making it clear GALIANO worked at Club Tan as a prostitute. Based on my knowledge of the investigation and my training and experience, the person talking with GALIANO was actually **SING**.

**E. The Meridian Phone is Connected to SING**

14. On or about February 15, 2023, Sgt. Cadwell performed a Google search for “Meridian Spa San Antonio.” The Google return showed that the Meridian Phone was still listed as the phone number for Meridian. Also on February 15, 2023, Sgt. Cadwell searched for Meridian on Rubmaps.ch and Eccie.net, websites used by sex buyers to review locations and persons from whom sexual services have been purchased. Both Rubmaps.ch and Eccie.net listed the Meridian Phone as the phone number for Meridian. Reviewers on these sites claimed to have purchased sexual services from Meridian in January 2023. Additional “escort seeking” sites showed Meridian as offering prostitution. The same day, at 10:21AM, Sgt. Cadwell sent a message to the Meridian Phone asking if it was Meridian, what their rates were, and who was working. At 10:32AM, he received the following response with the following photos from the Meridian Phone number:



🚫 We open 9am to 10pm daily. 🚫  
 🛀 We do sensual relaxation sessions, 40 per session entrance fee only. 🛀  
 💡 Tips for the ladies are not required but greatly appreciated one twenty. 🛀  
 💵 Cash only, incalls only. Walkin ok. 🛀  
 Meridian  
 2371 Austin highway  
 San Antonio Texas 78218  
 ❤️ Glass door with 2371 ❤️  
 🗨️ Text us if you have any complaints. 🗨️  
 🙏 Please do not exchange information with the workers, they are here to work. PLEASE LET US KNOW IF A WORKER GIVES YOU HER CONTACT INFORMATION. 🙏  
 📱 You can also text us on WhatsApp 📱



15. Included in the response was the address 2371 Austin Highway, San Antonio, Texas 78218, which is the historical address for Green Tea/Executive X and the current address for Meridian. In the response, above the address, Meridian was listed. The message Sgt. Cadwell received was very similar to text messages CAL DOJ agents received in response to texts/calls sent/made to the numbers associated with Club Tan and Lee Massage. Based on this information, Sgt. Cadwell secured a ping warrant for the Meridian Phone on February 27, 2023.

16. The pings associated with the Meridian Phone showed the person controlling the phone was in the vicinity of 3130 Charring Cross in the evenings and mornings. As noted above, 3130 Charring Cross is **SING's** address. Additionally, the pings associated with the Meridian Phone showed **SING** traveling to Fresno and Sacramento on a regular basis.

#### **F. SING travels to San Antonio to Manage Meridian**

17. Travel records subpoenaed in this case indicated **SING** often travels to San Antonio around the first of the month to check in on Meridian. Information received from CAL DOJ indicated that **SING** traveled to San Antonio from California on or about January 30, 2023. Additionally, pings for the Meridian Phone also showed **SING** traveled to San Antonio from California on March 3, 2023. The pings also showed him going to the area near Meridian once he



arrived. Once **SING** was in the San Antonio area, Sgt. Cadwell sent a message to **SING** via the Meridian Phone. In response, Sgt. Cadwell received a text message, similar to those included above, indicating which girls were then available at Meridian.

### **CONCLUSION**

18. Investigation has revealed **SING** owns and operates the Meridian brothel. Both bank records subpoenaed in this case and surveillance conducted by CAL DOJ agents confirmed **SING** lives at 3130 Charring Cross in Glendale, California, and the Meridian Phone has repeatedly pinged to the area near **SING's** home.

19. Additionally, as detailed above, the following facts indicate there is probable cause to believe **SING** has committed the offense of interstate travel or transportation in furtherance of a racketeering enterprise in violation of Title 18, United States Code, Section 1952(a)(3)(A):

- On or about February 15, 2023, Sgt. Cadwell, after identifying Meridian in multiple adult escort websites, sent a message to **SING** via the Meridian Phone and **SING** sent a response from the Meridian Phone indicating sexual services were available at Meridian.
- On or about March 3, 2023, **SING** traveled from California to San Antonio in order to oversee operations at Meridian, and subsequent to his arrival in San Antonio on March 3, 2023, **SING** responded to another text message sent by Sgt. Cadwell indicating sexual services were available at the Meridian brothel.

20. Based on the foregoing, there is probable cause to believe **SING** has committed the offense of interstate travel or transportation or use of a facility in interstate commerce in

furtherance of a racketeering enterprise in violation of Title 18, United States Code, Section 1952(a)(3)(A).

Respectfully submitted,

**WILLIAM M  
CARL**

Digitally signed by  
WILLIAM M CARL  
Date: 2023.03.31  
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William M. Carl  
Special Agent  
Homeland Security Investigations

Subscribed and sworn telephonically on this 31<sup>st</sup> day of March 2023.



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HONORABLE HENRY I. BEMPORAD  
UNITED STATES MAGISTRATE JUDGE